
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag. No. 22-16079
 :
 v. : Hon. José R. Almonte
 :
 BASHIMI BRISCOE : **CRIMINAL COMPLAINT**
 :
 :

I, Special Agent Stephanie Ramirez, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Justice, Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHMENT B

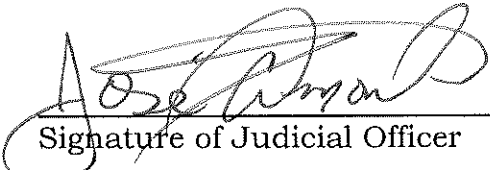
Continued on the attached page and made a part hereof:



Stephanie Ramirez
Special Agent
U.S. Drug Enforcement
Administration

Special Agent Stephanie Ramirez attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on July 12, 2022.

HONORABLE JOSÉ R. ALMONTE
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Import Controlled Substances)

From at least as early as in or around June 2022 through on or about July 11, 2022, in Colombia, and elsewhere, the defendant,

BASHIMI BRISCOE,

did knowingly and intentionally conspire and agree with others to import into the customs territory of the United States from places outside thereof, to include Colombia, a controlled substance in Schedule II, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, contrary to Title 21, United States Code, Sections 952 and 960(b)(1)(B)(ii).

In violation of Title 21, United States Code, Section 963.

COUNT TWO

(Conspiracy to Distribute Cocaine)

From at least as early as in or around June 2022 through on or about July 11, 2022, in the District of New Jersey and elsewhere, the defendant,

BASHIMI BRISCOE,

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Stephanie Ramirez, am a Special Agent with the Department of Justice, Drug Enforcement Administration ("DEA"). I have knowledge of the facts set forth below as a result of my participation in this investigation as well as from my review of reports from, and discussions with, other law enforcement personnel. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement is currently involved in the investigation of an international drug trafficking organization ("DTO") based in Colombia that works to import into the United States and distribute narcotics in the District of New Jersey and elsewhere. As part of this investigation, law enforcement learned that the defendant, Bashimi Briscoe ("Briscoe"), was importing narcotics into the United States for distribution. Specifically, in or around June 2022, law enforcement learned that Briscoe was planning to purchase approximately ten kilograms of cocaine in Colombia to import into the United States and then transport to New Jersey.

2. On or around July 5, 2022, Briscoe and his narcotics source of supply ("Co-Conspirator-1") contacted an individual ("Individual-1") in Colombia to discuss transporting approximately ten kilograms of cocaine to New Jersey. Individual-1 indicated that the narcotics would be delivered to his associate ("Individual-2") in New Jersey. Briscoe and Co-Conspirator-1 agreed to meet Individual-1 at a location in Colombia to transfer the kilograms of cocaine. In addition, they agreed on the delivery fee—approximately \$25,000 to be paid in cash once the narcotics were delivered in New Jersey.

3. Briscoe, Co-Conspirator-1, and Individual-1 met on or about July 8, 2022. During that meeting, Briscoe and Co-Conspirator-1 provided Individual-1 with approximately ten kilograms of suspected cocaine. Subsequently, law enforcement seized these narcotics. In total, law enforcement seized approximately ten kilograms of a substance that field-tested positive for the presence of cocaine.

4. Thereafter, in the District of New Jersey, law enforcement prepared a parcel containing approximately ten kilograms of a sham substance (the "Parcel"), which law enforcement then placed in a duffle bag. On or about July 11, 2022, law enforcement executed a controlled delivery of the Parcel between Individual-2 and Briscoe. More specifically, law enforcement then established physical and electronic surveillance of the Parcel. During their surveillance, law enforcement observed Briscoe meet with Individual-2 in a supermarket parking

lot in Kearny, New Jersey and accept the duffle bag containing the Parcel from Individual-2. Law enforcement then observed Briscoe place the duffel bag containing the Parcel in the trunk of his vehicle.

5. When Briscoe resumed driving, law enforcement followed his vehicle and executed a motor vehicle stop. During the traffic stop, Briscoe provided verbal and written consent for law enforcement to search his vehicle. Law enforcement then searched the vehicle and found the Parcel, which still contained the sham kilograms.

6. After Briscoe was advised of and waived his *Miranda* right in writing, he admitted to traveling to Colombia to purchase narcotics, paying \$60,000 in cash to Co-Conspirator-1 for ten kilograms of cocaine, and working to coordinate the transportation of these narcotics to the District of New Jersey. He explained that he paid Individual-2 a delivery fee when he picked up the Parcel, which he believed to contain ten kilograms of cocaine and that he planned to distribute the narcotics in and around Seattle, Washington. Briscoe stated that he had planned this transaction "for a long time."